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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBERT L. GOLDMAN;

Plaintiff,

v.

VIGILANT INSURANCE COMPANY, a New
York corporation and member of the CHUBB
GROUP OF INSURANCE COMPANIES;
DOES 1 through 100, inclusive; and ROE
CORPORATIONS I through 100, inclusive,

Defendants.

Case No.: 2:19-cv-2227-JAD-BNW

**STIPULATION & ORDER TO
EXTEND DISCOVERY PLAN AND
SCHEDULING ORDER DEADLINES**

(Second Request)

Pursuant to LR II 16-1, 26-1 (b), 26-3, and 26-4, and FRCP 16.1 and 26, PLAINTIFF ROBERT L. GOLDMAN ("Plaintiff") and DEFENDANT VIGILANT INSURANCE COMPANY ("Defendant") (collectively, the "Parties"), by and through their respective counsel, hereby stipulate and agree to extend the previously entered Discovery Plan and Scheduling Order deadlines. Notably, the parties have been cooperating well with one another and, since the initial Scheduling Order was entered, have: (a) exchanged Initial and Supplemental Disclosures; (b) exchanged discovery requests and responses; (c) attended additional site inspections; (d) conducted destructive testing at underlying property, including, without limitation, core drilling and core sampling (performed on October 28, 2020); and (e) completed a manometer survey (performed on November 18, 2020). Further, the depositions of Plaintiff Robert Goldman

and his son, Stewart Goldman, have been completed, with additional fact witness depositions scheduled over the next several weeks, including, without limitation:

Tom Stafford (Plaintiff Witness)	March 5, 2021
Willie Mack (Defendant Witness)	March 9, 2021
Tommy Le (Defendant Witness)	March 11, 2021
Mark Bertrand (Defendant Witness)	March 15, 2021
Peter Bonfante (Plaintiff Witness)	March 24, 2021

Plaintiffs experts have also identified the need to perform certain testing with respect to the two failed copper pipes from the Main Residence Leak. Notably, water testing to calculate the number of gallons per minute flowing from each hole on the two pipes. That testing has been scheduled for March 12, 2021. Consequently, because the parties' experts are still compiling and evaluating the data from that testing, good cause exists for extending the existing deadlines by an additional sixty (60) days as follows:

A. Discovery Cut-Off Date:

Existing Deadline: May 17, 2021

New Deadline: July 16, 2021

B. Amending Pleadings and Adding Parties:

No changes.

C. FRCP 26(a)(2) Disclosure (Experts):

1. Expert Reports:

Initial Disclosure: March 14, 2021

New Deadline: May 14, 2021

2. Rebuttal Disclosure:

Existing Deadline: April 13, 2021

New Deadline: June 14, 2021

D. Interim Status Report:

Existing Deadline: March 23, 2021

New Deadline: May 24, 2021

E. Mediation

To be completed by July 30, 2021

F. Dispositive Motions

Existing Deadline: June 14, 2021

New Deadline: August 13, 2021

G. Pretrial Order:

Existing Deadline: July 12, 2021

New Deadline: September 10, 2021

DATED this 22nd day of February, 2021.

MARQUIZ LAW OFFICE, P.C.

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By: /s/ Craig A. Marquiz

By: /s/ Cheryl A. Grames

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ORDER

IT IS SO ORDERED.

DATED this 25th of February, 2021.


UNITED STATES MAGISTRATE JUDGE